

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

William Thomason, Jr. as	)	Civil Action No.: 6:14-cv-04895-BHH
Executor and Surviving Closest	)	
Relative of William Poole Thomason	)	
and Eugenia McCuen Thomason,	)	
	)	
Plaintiff,	)	
	)	<b>DEFENDANT TOYOTA MOTOR</b>
vs.	)	<b>SALES, U.S.A., INC.'S ANSWERS TO</b>
	)	<b>LOCAL RULE 26.01</b>
	)	<b>INTERROGATORIES</b>
Toyota Motor Engineering &	)	
Manufacturing North America, Inc.,	)	
Toyota Motor Manufacturing,	)	
Kentucky, Inc., and Toyota Motor Sales,	)	
U.S.A., Inc.	)	
	)	
Defendants.	)	

Pursuant to Local Civil Rule 26.01, Defendant Toyota Motor Sales, U.S.A., Inc. ("TMS") hereby responds to the Court's Interrogatories and reserves the right to supplement these responses.

**LOCAL RULE 26.01 INTERROGATORIES**

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: TMS currently does not have enough information to determine whether any parties may have a subrogation interest in this litigation, but will supplement this response as warranted by discovery.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: Plaintiff's claims are actions at law, which should be tried by a jury.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: TMS is a subsidiary of Toyota Motor North America, Inc. (“TMA”). TMA is a subsidiary of Toyota Motor Corporation (“TMC”). No publicly owned corporation owns 10% or more of the stock of TMC.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: Upon information and belief, because the subject incident occurred in Greenville County, South Carolina, venue lies within this division pursuant to 28 U.S.C. § 1441(a).**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: To the best of TMS's knowledge, this action is not related to any other case filed in the District.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: TMS is correctly identified in Plaintiff's Complaint.**

(G) If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting the claim against you in this matter, identify such person or entity and describe the basis of said liability.

**RESPONSE: TMS currently does not have enough information to determine whether or not another party is liable to it or Plaintiff in whole or part, but will supplement this response as warranted by discovery.**

BOWMAN AND BROOKE LLP

/s/Angela G. Strickland

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February 23, 2015

Columbia, South Carolina